

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: ) CHAPTER 13  
 )  
Ladaris Hughes ) CASE NO. 21-10454-jps  
 )  
 ) JUDGE PRICE SMITH  
Debtor(s). )

**NOTICE OF MOTION TO REDEEM**

The Debtor has filed papers with the Court in this bankruptcy case as it relates to you herein.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the Motion then, on or before March 30, 2021, you or your attorney must:

File with the Court a written objection or response to the Motion, explaining your position, at:

Clerk of Court  
United States Bankruptcy Court  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue  
Cleveland, Ohio 44114

If you mail your objection or response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail or email a copy to:

Aaron T. Kimbrell, Esq.  
6100 Oak Tree Blvd  
Independence, OH  
Email: [Akimbrell@fairmaxlaw.com](mailto:Akimbrell@fairmaxlaw.com)

Attend the hearing on the Motion scheduled to be held in Courtroom 2B, H.M. Metzenbaum U.S. Courthouse, 201 Superior Avenue NE, Cleveland, Ohio 44114.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the relief.

Date: March 9, 2021

/s/Aaron T. Kimbrell  
Aaron T. Kimbrell (0080406)  
Attorney for Debtor  
6100 Oak Tree Blvd  
Independence, OH  
(216) 306-0606  
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Email: [akimbrell@fairmaxlaw.com](mailto:akimbrell@fairmaxlaw.com)

CERTIFICATE OF SERVICE

I certify that on March 9, 2021, a true and correct copy of the Motion to Redeem was served:

Virgil E. Brown, Jr.  
[virgil@vebtrustee.com](mailto:virgil@vebtrustee.com), [vbrownjr@ecf.axosfs.com](mailto:vbrownjr@ecf.axosfs.com)

Aaron T Kimbrell on behalf of Debtor Ladaris Alonzo Hughes, Sr.  
[akimbrell@fairmaxlaw.com](mailto:akimbrell@fairmaxlaw.com)

and by Regular U.S. mail, postage prepaid, on

Ladaris Hughes, 2511 East 38th St, Cleveland, OH 44115

Creditor:  
Bridgecrest, PO BOX 29018 Phoenix, AZ 85038

/s/Aaron T. Kimbrell  
Aaron T. Kimbrell (0080406)  
Attorney for Petitioners